## GOTTLIEB & ASSOCIATES

150 E. 18th St., Suite PHR · New York, NY 10003 Tel (212) 228-9795 · Fax (212) 982-6284 NYIG@aol.com

## **VIA ECF**

The Honorable Lorna G. Schofield United States District Judge United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 August 16, 2022
Application GRANTED in part and DENIED in part. The initial conference scheduled for August 31, 2022, at 4:20 P.M., is adjourned to October 5, 2022, at 4:20 P.M. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order required in advance of that conference is extended to September 28, 2022, at 12:00 P.M. Defendant shall answer, move or otherwise respond to the Complaint by September 15, 2022.

Dated: August 17, 2022 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Senior v. Collegiate Merchandise Group Inc.,

Case No.: 1:22-cv-5512

Dear Judge Schofield,

The undersigned represents Milagros Senior, on behalf of herself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Collegiate Merchandise Group Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for August 31, 2022, at 4:20 PM (Dkt. 6) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 30 days to respond to the Complaint until September 15, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.

Respectfully submitted,

**GOTTLIEB & ASSOCIATES** 

/s/Michael A. LaBollita, Esq. Michael A. LaBollita, Esq.